

ENCLOSURE

EPA COMMENTS ON REVISED CONTINGENCY PLAN SUBMITTED BY LOCKHEED MARTIN CORPORATION (LMC) TO EPA ON SEPTEMBER 12, 2012

EPA provides the following comments on the above-referenced plan. Please be aware that these comments may not be comprehensive and that EPA may have additional comments which may be provided at a later date. LMC is directed to revise the contingency plan consistent with these comments and to resubmit the newly revised plan to EPA unless otherwise directed in writing.

1. Page 20, Section V.D.7. This section states that an overflow/detention pond associated with the CERCLA building may be used as interim storage for recovered leachate or other impacted materials. Clarify whether this is a lined unit subject to regular inspections and maintenance. If it is not, designate an appropriate location for interim storage of contaminated materials.
2. Page 22, Section VI, Organization and Duties, first paragraph. The last sentence of this paragraph states that the Emergency Coordinator must immediately report an occurrence to Lockheed Martin and Arcadis management. This statement is inconsistent with the notification procedure provided in Section V.D.1. Revise these sections as required to provide a clear, consistent notification procedure. Include applicable telephone numbers for all required contacts.
3. Page 24, Section VIII.A, Level of Training Required for Routine Work. Revise the first paragraph to include all leachate collection and treatment systems.
4. Page 24, 25, Bullet concerning “Exempt personnel” – Objection is made to the need for an escort while EPA is on Site. EPA’s authority to access the Site is not to be constrained. Full objection is made to the language “or 2) restricted as to the type of work they may perform or the places where they can do it” – EPA construes this text as an unacceptable restriction of access to the Site. EPA has retained all of its authority to access the Site as EPA deems necessary and to take response action at the Site as EPA deems necessary.
5. Page 26, Section VIII.D. Clarify where the “office of the RCRA landfill” is located.
6. Page 27, Section IX.A, Landfills. Although this section is entitled “Landfills”, it appears to focus exclusively on the RCRA Landfill. Revise this section to include the CERCLA landfill.

7. Page 27, Section IX.A, Landfills, second paragraph. It is not clear why a proposed short-term inspection frequency for the landfill is included in the contingency plan. If this section is retained here, provide the rationale for proposing to reduce the inspection frequency to semi-annual after conducting thorough quarterly inspections of the landfills from September 2012 to September 2013.
8. Page 27, Section IX.A, Landfills, third paragraph. Delete the phrase “in the cover” from the first sentence. This sentence must read “... and a description of any defects observed.”
9. Page 27, Section IX.A, Landfills, third paragraph. This paragraph states that “the gas collection and control system will also be inspected and maintained” EPA is not aware of a gas collection and control system at this Site. Clarify or delete this statement. Further, it is not clear if the systems discussed on pages 27 and 43 are the same or different systems. Clarification is needed on both pages.
10. Page 27, the fourth paragraph states that defects that may impact the long-term integrity of the final cover system will be remedied. This statement should be modified to include defects that may impact the short-term integrity of the final cover system.
11. Page 28, Section IX.B, Groundwater Compliance Monitoring Program. Delete this section as written, as it includes a number of statements that are not relevant to the contingency plan. Provide a brief overview of the number and location of monitoring wells so that emergency responders are aware of their presence.
12. Page 29, Section IX.D, Leachate Control System. The second paragraph of this section states that tanks are inspected “inside and out” for corrosion and signs of rupture.” Revise this statement to clarify that the RCRA leachate tank is an in-ground unit and exterior inspections are not conducted.
13. Pages 30 through 34, Inspection Forms. Correct the inconsistencies and errors in these forms, including the following:
 - Landfill inspection forms state that annual inspections are required. This is inconsistent with the statements earlier in this Contingency Plan that the landfills are to be inspected quarterly and/or semi-annually.
 - The RCRA and CERCLA Landfill inspection forms appear to be a copy of the inspection form for the Scrubber Sludge Ponds (e.g., “Exposed Sludge,” “Area Adjacent to the SSPs,” “Fence Clear of Trees”). These forms must be tailored to the construction of the RCRA and CERCLA Landfills.

14. Page 35, Section X, Communications. This section states that the Emergency Coordinator will notify employees of Specialty Aluminum Products and Tennyson Engineering of an emergency *after* all site personnel have been evacuated and checked in. This procedure is inconsistent with that provided in Section V.D.1. Revise this section to provide clear and consistent evacuation and notification procedures.
15. Page 35, the use of a visual red light high water/leachate alarm for the RCRA sump and for Lift Stations 1 and 2 at the CERCLA landfill is insufficient under this plan. The visual alarm cannot be seen from other than the access gate at the former NAW entrance gate and will not serve to alert the Emergency Coordinator in a timely fashion unless that individual happens to be at the access gate at the time the alarm triggers. An additional alarm system should be installed that can alert the Emergency Coordinator regardless of where the Emergency Coordinator is located at the time of the alarm.
16. Page 37, the statement “no other type of monitoring device is appropriate for the hazards at this facility” is not explained. This statement should be explained or removed.
17. Page 39, Exhibit XI-1, Emergency Equipment List. Revise this list to include the Level B personal protection equipment discussed in Section XI.C.
18. Page 39, Exhibit XI-1, Emergency Equipment List. Specify the location of the “Leachate Transfer Building.” If this is the building that houses the RCRA leachate sump, specify whether personnel are to follow normal operating procedure and vent the building for five to ten minutes prior to entering to obtain the emergency equipment. Alternatively, designate another location for storing emergency equipment on site.
19. Page 43, both sub-bullets under the bullet K088 contain assertions that are not supported. Additional explanation and justification should be provided to support the assertions or the sub-bullets should be removed.
20. Page 43, both sub-bullets under the bullet the waste is moist contain assertions that are not supported. The first bullet should be removed unless substantiation is provided for the assertions made. The second bullet should also be substantiated or removed.
21. Page 43, the first sub-bullet under the bullet ignition of gas inside the landfill, concerns a “flame arrestor” and seeks EPA concurrence. This sub-bullet discusses a hypothetical

device that has not been discussed with EPA and as such should not be in this plan at this time. Inclusion of this bullet suggests that such a device has been reviewed by EPA and could mislead emergency responders into thinking that such a device is in place, potentially causing such responders to underestimate the actual risk of a fire within the RCRA or CERCLA landfill . The second sub-bullet is discussed in comment 2, *supra*.

22. Page 44, the bullet concerning consequences of a fire needs to be consistent with earlier sections of this plan concerning fire. Revise the plan accordingly.
23. Page 44, the second paragraph concerning Scrubber Sludge Ponds states that the soil layer is 24” thick. However, the second paragraph of page 46 states that the Scrubber Sludge Ponds cover is approximately 5 feet thick. The inconsistency needs to be corrected. Many of EPA’s records indicate that the 24” thickness is the correct number although the soil cover has also been described as 12” thick in places.
24. Page 44, the third paragraph concerning Scrubber Sludge Ponds states that the consequences of a fire in and near the ponds would be the same as most properties in the community. This statement should be revised. EPA assumes that most properties in the community are not hazardous waste/substance landfills and that consequently, special or additional procedures might be needed.
25. Page 45, the first full paragraph states that fires in the leachate collection and treatment systems can be addressed following the procedures the municipal fire department uses at most properties with no increased risk. This statement should be revised. EPA assumes that most properties to which the municipal fire department responds do not contain known hazardous substance/waste leachate and that consequently, special or additional procedures might be needed.
26. Page 52, the section Levels of Exposure, refers to Exhibit XII-1 which contains a model of HCN emissions based on assumptions that have not been verified. The model and Exhibit XII-1 do not appear to have been peer reviewed and the assumptions do not appear to have been validated. The conclusory statement “Lockheed Martin concludes

that the site presents no airborne health hazard for people who stay more than four feet from the landfill gas vent” is wholly unsupported as it appears to be based on the model which seems to have been run using unvalidated assumptions. It is recommended that this section be removed along with the following section Responses to Release because the conclusion drawn is not supported by validated data at this time.

27. Page 53, Exhibit XII-1 Aloha Emissions Model, should be removed in its entirety at this time as the information provided appears to be based on Portland, Oregon and on an assumption that source strength is 1 ft³/min of gas at 1% HCN. No validation of the assumption is provided and no validating data is provided to support how the model was run to produce the graph.
28. Page 55, the bullet concerning leachate transfer from the RCRA landfill to the leachate collection tank does not include any provision for steps that could be taken to limit a spill to the ground or to dig up any soil in the event of a spill. In addition to taking steps to limit overland migration of a spill, steps should be taken to limit spillage onto the ground and to dig up contaminated soil/ground so as to limit migration of a spill to surface and groundwater.
29. Provide a figure showing the locations of all buildings, the overflow/detention pond, culverts, diversion levees, ditches, all valves and other process shut-off devices, and the location of all emergency response equipment, fire extinguishers, etc. Clearly label all buildings and equipment that referenced in this Contingency Plan. EPA recommends including photographs of each valve, clearly labeled with the direction to turn in order to shut off a release.